



## Montana Psychological Association

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Dear Membership of the Economic Affairs Interim Committee:

As stated in our earlier communication to the Work Group for SJR 35, the Montana Psychological Association (MPA) is monitoring the developments within this committee closely, and its membership is both concerned and interested about these matters.

We wish to ensure that the membership of SJR 35 understands that Montana Law, (MCA § 37-17-102), defines both the practice of psychology and the title "psychologist" in a unique and highly specialized matter. Psychologists, by the statutory definition cited above, have received a doctoral degree and, as described in MCA § 37-17-302, have extensive training, experience and supervision in areas of practice critically unique from other disciplines and licensed professionals. This includes, but is not limited to, the practice of:

- Modification of human behavior by the application of psychological principles, methods, and procedures for the purpose of eliminating symptomatic, maladaptive, or undesired behavior and improving interpersonal relations, work and life adjustment, personal effectiveness, and mental health,
- Psychological testing and evaluation or assessment of personal characteristics such as intelligence, personality, abilities, interests, aptitudes, and neuropsychological functioning;
- Counseling, psychoanalysis, psychotherapy, hypnosis, biofeedback, and behavior analysis and therapy,
- And, treatment of mental and emotional disorders or disabilities, chemical dependency, substance abuse, and the psychological aspects of physical illness, accident, injury, or disability; and psychoeducational evaluation, therapy, remediation, and consultation.

In addition, fundamental to the ethical and safe delivery of behavioral healthcare is the ability to critically evaluate literature, practice and

research. The vast majority of our membership possess doctoral degrees that include advanced training in evaluating the literature, research methods and statistical methodologies. It is this background that enables psychologists to be uniquely prepared to explore new trends in behavioral health and critically evaluate the literature on current and proposed practices.

MPA's present position is that having a Licensing Board that is both aware of, and has a specialized working knowledge of, the unique ethics, practice and title of psychologists will best insure "...accountability as it relates to public safety and protection."<sup>1</sup> Without this specialized knowledge, we are concerned that a Board may not be able to assure accountability and the protection of the public safety of the Citizens of Montana.

We also feel compelled to share our view that the proposed "...increase[d] cost efficiencies and governance efficiencies..." through SJR 35 via "...consolidating boards and providing subgroups within boards..." is a rather bewildering aspiration. As per our knowledge of our Board, and Mr. Brown's briefing on October 12<sup>th</sup> at the Work Group session (Mr. Brown is the Division Administrator for the Department of Labor and Industry), the Board is paid for directly by the annual licensing fee assessed on licensed psychologists.

It is MPA's intent to work with the Economic Affairs Interim Committee and the SJR 35 Work Group through ongoing dialogue with the committee to clarify these issues, and to ensure that the Citizens of the State of Montana continue to be provided effective, efficient and safe services through our licensed professionals via a clear and open dialogue.

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<sup>1</sup> Phrasing here taken directly from second paragraph of Senate Joint Resolution No. 35.